

AGENCY RESPONSE: National Endowment for the Arts

CONTACT NAME: Sandy Stueckler
Director, Finance Office
202-682-5491
stueckls@arts.endow.gov
www.arts.gov

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? **NO**. If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

Which federal agency (or agencies) receives the use of real property?

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)

What is the estimated amount that is not reimbursed?

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.

Does your entity anticipate continuing to provide the use of the real property in future years?

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? **NO**. If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information:

Which federal agency (or agencies) provides the use of the real property?

Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? See SFFAS No. 4, par. 112.)

Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered.

AGENCY RESPONSE: Occupational Safety and Health Administration (OSHA)
CONTACT NAME: Dennis Sprouse (202-693-2429)

Dear Ms. Valentine,

The Occupational Safety and Health Administration (OSHA) does not have real property that is being used by another entity.

If you have any further questions, please let me know.

AGENCY RESPONSE: Department of Housing and Urban Development (HUD)
CONTACT NAME: Rita Hebb (202-708-0614 x3695)

Attached (below) is HUD's response to FASAB's survey. If you have questions, please contact Rita Hebb at 202-708-0614, ext 3695. Thank you for the opportunity to respond.

INTER-ENTITY REAL PROPERTY COSTS QUESTIONNAIRE – *HUD RESPONSE*

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

N/A

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? *No, HUD pays GSA full reimbursement for use of real property throughout the nation.*

If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information: *N/A*

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered. *None*

AGENCY RESPONSE: Department of Education (DoEd)
CONTACT NAME: Ron Coates (202-401-2090)

The subject survey has been completed and is attached/forwarded as requested. Although the survey criteria/questions are not applicable to the Department of Education, we hope that the narrative information provided is helpful in the development of SFFAS No.4 guidance, regarding the identity and recognition of Inter-Entity Real Property Cost.

We appreciate the opportunity to comment on this survey/document. If there are questions regarding our response I can be reached at (202) 401-2090.

Thanks,
Ron

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

The Department of Education does not provide the use of Real Property to other Federal entities without reimbursement or with less than full reimbursement. The Department is not a land holding agency and we do not provide Realty services to other Federal agencies. The Department utilizes the services of GSA for our realty needs; obtaining leased properties in commercially leased space or via occupancy agreements with GSA for Federally owned property. The Department does have two program areas wherein real property activities appear to exist, Impact Aid program and Post-Secondary Education College Housing Program. Neither of these programs meets the survey criteria of Inter-Entity Real Property Costs.

In January 2001, the status of the Impact Aid school facilities were reviewed and it was acknowledged that the Department's financial statements need not include Department owned Impact Aid facilities. This determination was based on a number of factors including:

The Impact Aid school buildings that are owned solely by the Department are unique in that they have low or negative value since they are 40-50 years old. Most were built in the early 1950's when the Impact Aid statute was first authorized. The Department does not acquire buildings under this authority.

In addition, the Impact Aid statute requires that the current holdings be transferred to appropriate entities as soon as possible and at no cost; therefore, fair market value cannot factor into the transfers. The recipients also must agree to the transfers, which, combined with low appropriations under this authority, has impeded the rate at which the facilities can be transferred. (Generally, the Department has to provide grants of \$2-4 million to upgrade the facilities to contemporary standards and, in exchange, districts agree to accept the facilities.) In the interim, Local Education Agencies continue to operate the schools on a daily basis through use permits from the Department. Many of the permits from the 1950's are still in effect.

The Department does not own the land underlying any of the buildings, which are all located on military bases. The restrictions on access to and on the military bases also minimize the value of the Department school facilities.

Many of these old buildings are in bad condition, and, in recent years, the military bases where certain school facilities were located have demolished several of them. In these situations, the buildings represent a potential negative value for the Department because other agencies may not always be able to assist with demolition.

Even though the buildings are of low to no value and at the end of their life cycle, the Department's Impact Aid Program maintains a property control system that meets the OMB standards for managing assets. A list of school facilities is maintained that includes the characteristics and location of the facilities. Subject to the availability of appropriations, the Program, consistent with one of its performance indicators, has been able to transfer 3-5 buildings a year for the last several years. The program also participates in GSA's Worldwide Web Inventory System and the properties are listed on that inventory, which will be updated annually as transfers occur or properties are demolished or declared as excess.

The survey criteria/questions do not apply to the Office of Post-Secondary, as there are no Inter-Entity Real Property Costs associated with the College Housing program.

Which federal agency (or agencies) receives the use of real property?

Not Applicable

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

Not Applicable

Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)

Not Applicable

What is the estimated amount that is not reimbursed?

Not applicable

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

Not Applicable

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.

Not Applicable

Does your entity anticipate continuing to provide the use of the real property in future years?

Not Applicable

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

Not Applicable

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information:

The Department rents office space from the GSA and pays full market rate in rental payments for the occupied space utilized for Department services.

Which federal agency (or agencies) provides the use of the real property?

Not Applicable

Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

Not Applicable

What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

Not Applicable

Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

Not Applicable

Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? See SFFAS No. 4, par. 112.)

Not Applicable

Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

Not Applicable

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

Not Applicable

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered.

Not Applicable

AGENCY RESPONSE: Small Business Administration (SBA)
CONTACT NAME: John Kushman (202-205-6103)

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information:

Which federal agency (or agencies) provides the use of the real property?

Various DOD installations involved in Federal procurement.

Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

(b) without reimbursement.

What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

37 SBA personnel X 100 sq ft/location X \$30/sq ft = \$111,000

Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

No.

Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions?

See SFFAS No. 4, par. 112.)

Absolutely not. Costs are not significant to SBA's \$800 million budget.

Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

It is a minor, insignificant part of the SBA's output.

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

No, these costs do not meet the inter-entity cost recognition criteria. They are only .0001 percent of the SBA's budget.

AGENCY RESPONSE: Nuclear Regulatory Commission (NRC)
CONTACT NAME: Carl Fredericks

The following is the NRC's response to the FASAB questionnaire on inter-entity real property costs.

1. Provider Questions: Does your entity provide the use of real property to other Federal entities without reimbursement or with less than full reimbursement? *No.*
2. Receiver questions: Does your entity receive the use of real property from other Federal entities without reimbursement or with less than full reimbursement? *No. GSA charges the NRC rent for the use of office space. GSA regularly performs surveys to determine current market rates for space and looks at comparable properties in the area to determine market rates.*

AGENCY RESPONSE: Department of Defense (DoD)
CONTACT NAME: Lisa Dingman (703-604-6350 x104)

See attached PDF file.

AGENCY RESPONSE: Indian Health Service (IHS)
CONTACT NAME: Daniel C. Madrano (301-443-0307)

I. Provider Questions: N/A

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

- (1) Which federal agency (or agencies) receives the use of real property?
- (2) Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?
- (3) Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)
- (4) What is the estimated amount that is not reimbursed?
- (5) Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.
- (6) If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.
- (7) Does your entity anticipate continuing to provide the use of the real property in future years?
- (8) Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of

the real property that your entity uses and for each real property use please supply the following information:

- (1) Which federal agency (or agencies) provides the use of the real property?
US Air Force
- (2) Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)
The IHS reimburses the Air Force for utility and custodial services only. This is a warehouse provided to us under Operation Transam whereby DOD provides IHS access equipment and supplies.
- (3) What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?
The IHS reimburses the Air Force \$16,000 for the above services. The rental cost is unknown. The Air Force may be able to provide.
- (4) Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.
No
- (5) Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? See SFFAS No. 4, par. 112.)
No, any rental costs at this one facility would not be significant to the overall IHS appropriation of \$2.4 billion.
- (6) Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)
No
- (7) Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.
Unknown

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered.

AGENCY RESPONSE: Social Security Administration (SSA)
CONTACT NAME: Chris Molander (410-965-0003)

We received your letter dated November 25, 2002 concerning "Inter-Entity Real Property Costs" with the accompanying questionnaire that you asked us to complete. We were relatively confident up-front that the Social Security Administration (SSA) neither provides nor receives the use of real property without reimbursement. To ensure we were correct though, we researched the issue by contacting our facilities people nationwide. With only one exception, they confirmed our assumptions. It seems that in one of our regional offices, the Public Health Service provides SSA with about 100 square feet of space free of charge. I am sure this is insignificant in the context of the broad study you are performing. Consequently, we did not complete your questionnaire.

SSA does maintain a large presence in the fifty states, U.S. territories, and in foreign countries. We have a complex of buildings at headquarters in the Baltimore area, and approximately 1300 field offices throughout the country. In certain cases, primarily in headquarters, SSA originally financed the acquisition of land and construction of buildings and retains ownership. In all other locations, the General Services Administration provides space and we reimburse it accordingly. In certain foreign countries, we reimburse the State Department for the space (and other services) it provides in its embassies.

If you have any further questions or comments, please call me at 410-965-0003.

*Chris Molander
Director, Division of Central Accounting and Reporting
Social Security Administration*

AGENCY RESPONSE: National Science Foundation (NSF)
CONTACT NAME: Preston Rich (703-292-4465)

The following is my response to your incoming subject memorandum dated November 25, 2002, a copy of which is attached.

After a thorough review of the missions, programs and initiatives underway at the National Science Foundation (NSF) only one aspect of one program currently appears to meet any of the definitions provided within the incoming memorandum and within the context of SFFAS No. 4. As background, the mission of NSF is to promote the progress of science; to advance the national health, prosperity, and welfare; and to secure the national defense. A short summary of the one program which may be pertinent to the definitions for the subject costs follows:

Interferometer Gravitational-Wave Observatory (LIGO)

The NSF LIGO construction project began in FY 1992 as a collaboration between physicists and engineers at the California Institute of Technology and the Massachusetts Institute of Technology to test the dynamical features of Einstein's theory of gravity and to study the properties of intense gravitational fields from their radiation. Today, several other institutions are also involved. LIGO consists of identical but widely separated detectors, one in Hanford, Washington and the other in Livingston, Louisiana, that will be used for fundamental physics experiments to directly detect gravitational waves and gather data on their sources.

The NSF LIGO program is likely a "Receiver" as defined by the attached memorandum since LIGO is a major NSF facility that is housed on a large tract of property owned by the Department of Energy (DOE) in Hanford, Washington. No cost reimbursement is requested by, or provided to, the DOE for the use of the land on which LIGO resides. While there are no hard dollar numbers available for the use of this land by the LIGO, there is an approximate equivalent exchange of "value". Quoting from the Permit granted by the DoE to the NSF on 8/26/93 "As consideration for this Permit, DoE recognizes that NSF is a Federal agency and, as such, mutual benefits are derived from this Permit." There is a further question as to whether the unreimbursed value of the land use would meet the materiality threshold as defined in SFFAS No. 4.

Please let me know if you need further clarification. My contact on this is Preston Rich of my office at 703 292 4465 or email: < brich@nsf.gov >.

Don McCrory, NSF DCFO

AGENCY RESPONSE: Department of Veterans Administration (VA)

CONTACT NAME: Janet McLean

Accounting Policy Division/047GA1

202-273-8802

Janet.McLean@mail.va.gov

The attached is the Department of Veterans Administration's response to the questions posed in your 25 November 2002 survey. Besides the National Cemetery Administration we are aware of no other VA administration or staff office providing or receiving the use of real property to/from other federal entities without reimbursement or with less than full reimbursement. Also, VA does not know of any other factors specific to inter-entity real property costs that should be considered.

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

Which federal agency (or agencies) receives the use of real property?

U.S. Department of Interior (DOI), Richmond National Battlefield Park leases the lodge at Glendale National Cemetery, and Federal Aviation Administration (FAA) has an electronic "beacon" located on Calverton National Cemetery property.

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in Statement of Federal Financial Accounting Standard (SFFAS) No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

No, National Cemetery Administration (NCA) has not conducted a fair market value study of comparable properties available for lease.

Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.) *No.*

What is the estimated amount that is not reimbursed?

Unknown. NCA has not conducted a fair market value study of comparable properties available for lease.

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

Yes. DOI, Richmond National Battlefield Park provides maintenance on the lodge. In addition, they have constructed two restrooms on the property at a cost of \$85,000. FAA does not provide any compensation.

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.

Not applicable.

Does your entity anticipate continuing to provide the use of the real property in future years?

Yes. DOI, Richmond National Battlefield Park has a lease permit that expires 31 January 2019. FAA has recently requested a renewal of their easement for an additional ten years.

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

This question can only be answered by the receiving entity, as according to paragraph 112, materiality should be considered in terms of the importance of the transaction to the receiving entity.

II. Receiver Questions:

NCA does not receive the use of any real property from other federal entities without reimbursement or with less than full reimbursement.

[Note: VA/NCA has received at no cost land from other Federal components for national cemetery development or expansion via legislative initiative, with full title to the land transferred to VA. Property has been transferred/received from Army, Navy, Air Force, and/or the Department of Interior.]

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered.

VA does not know of any other factors specific to inter-entity real property costs that should be considered.

AGENCY RESPONSE: Corporation for National and Community Service (CNCS)
CONTACT NAME: Stuart Graff (202-606-5000 x 230)

The following is a note I wrote to my supervisor shortly after the Survey on Inter-Entity Real Property Costs was issued. Unfortunately, I cannot remember whether or not I ever sent you the brief response suggested in the note. In any case I could not find such a note and thus presume that I did not.

Please accept the comment in the following message as the response from the Corporation for National and Community Service, and also please accept my apology for not providing this to you on a more timely basis.

*Stuart L. Graff
Financial Policy and Management Control
Chief Financial Officer Department
Corporation for National and Community Service
1201 New York Avenue, NW, Room 7122
Washington, DC 20525
Telephone (202) 606-5000, Ext. 230
Facsimile (202) 565-2780*

Jerry,

*I have reviewed the Inter-Entity Real Property Costs survey prepared by Monica Valentine of FASAB on behalf of an Accounting and Auditing Policy Committee task force. The survey is only concerned with inter-entity costs that are not fully reimbursed. **I believe that all real property costs incurred by the Corporation are fully reimbursed through IPAC payments to GSA for the full market value of the leased property we occupy at headquarters, service centers and state offices.** Therefore, no response is necessary to the survey. However, I believe in the interest of clarity that we should respond by E-mail to the survey author with a negative response. **We can say that all use of real property provided to us by GSA is fully compensated by intergovernmental payments to GSA.** That way, Monica Valentine will know that we have considered her questionnaire and decided that we did not have any relevant information to provide.*

What do you think?

Stu

AGENCY RESPONSE: Department of Energy (DoE)
CONTACT NAME: Ed Dailide (202-586-5422)

I am responding to your email of January 14 inquiring about the status of DOE's response to the FASAB survey on inter-entity real property costs. Below you'll find our response to the survey that we had sent earlier. Unfortunately you never received it because of a typo in your email address. Attached are responses that we received from our realty officers in the field that have situations that meet the survey criteria. I know that Jim Cayce has had some discussions with you to get clarification on the questionnaire. Hopefully, the attached questionnaires are responsive to your needs. If you have any questions or need some additional information, pls contact me or Andy Duran at 202-586-0072 directly.

*Ed Dailide
Deputy Director, Facilities & Infrastructure
Office of Engineering and Construction Management
Department of Energy
Tell: 202-586-5422
Fax: 202-586-4500
ed.dailide@hq.doe.gov*

DoE's Albuquerque Operations Office (AL) Survey Response

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

Which federal agency (or agencies) receives the use of real property?

Answer: The Albuquerque Operations Office has a land use permit with the Department of Air Force Kirtland Air Force Base (KAFB), which grants KAFB use of vacant DOE-managed land for Air Force purposes (Air Force Inspection and Safety Center). The Department of Energy National Nuclear Security Administration (NNSA) resides on KAFB. NNSA is in the process of transferring ownership of the land under permit to KAFB.

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

Answer: The cost of providing KAFB use of that site is not measured or calculated because the cost is considered minimal. DOE also has numerous

land use permits for use of Air Force lands on KAFB which is discussed in the next section (Receiver Questions).

Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)

No.

What is the estimated amount that is not reimbursed?

Unknown.

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

No.

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.

Not Applicable.

Does your entity anticipate continuing to provide the use of the real property in future years?

No, property is being transferred to receiving entity.

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

No.

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information:

Which federal agency (or agencies) provides the use of the real property?

Answer: United States Department of Air Force, Kirtland Air Force Base (KAFB).

Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

No. The real property is provided under land use permits or revocable license agreements at no cost the Department of Energy National Nuclear Security Administration (NNSA). Waivers of rental consideration have been approved by the USAF-KAFB based on the defense nature of the work performed by NNSA, which directly supports the defense mission.

What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

See explanation in No. 2 above.

Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

No.

Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? See SFFAS No. 4, par. 112.)

No.

Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

No.

Do you believe these real property costs meet the inter-entity cost recognition criteria?
(See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

No.

DoE's Rocky Flats Survey Response

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

Which federal agency (or agencies) receives the use of real property?

Answer:

The following Federal agencies use the Rocky Flats North Live Fire firing range on an infrequent basis when it is not being used for the Rocky Flats mission requirements.

Bureau of Alcohol, Tobacco, & Firearms

Federal Probation Department

US Marshal Service

Environmental Protection Agency

US Navy Seals – Reserve Unit

US Fish & Wildlife Service – Enforcement Unit

Federal Air Marshal Service

US Drug Enforcement Agency

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

Answer:

The cost of providing oversight of the range when used by other entities is not measured or calculated because it is so minor. In some cases the federal entities use the facilities on the weekends, or provide their own Range Masters and supervision, and there is no addition cost at all. The value of the facility to the government (DOE) is already realized by the site personnel that use the facilities as part of their training and job certifications.

Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)

Answer: No costs are reimbursed.

What is the estimated amount that is not reimbursed? Estimate is too minimal to calculate.

Answer: All costs are fixed costs.

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

Answer: Cross services agreements do exist with local law enforcement but no federal benefit is derived from these other agencies. The US government has gained a benefit in utilizing this facility as in several cases the time constraints did not allow other facilities to be procured or other facilities simply did not exist.

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.

Answer: No.

Does your entity anticipate continuing to provide the use of the real property in future years?

Answer: Yes. But only for a couple more years until the Rocky flats site is closed and becomes a National Wildlife Refuge.

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

Answer: Yes.

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information:

Answer: Entities were not contacted.

Which federal agency (or agencies) provides the use of the real property?

Answer: See No. 1 above.

Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

Answer: No.

What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

Answer: None.

Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

Answer: No.

Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? See SFFAS No. 4, par. 112.)

Answer: Probably not. With the difficulty in scheduling, this is only used as a convenience or in emergency cases such as the US Marshal's use for the Oklahoma City bombing trial in Denver.

Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

Answer: No answer.

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered.

DoE's Los Alamos Survey Response

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

Which federal agency (or agencies) receives the use of real property?

The Los Alamos site Operations has the following DOE properties, which are being used by other federal entities.

Contract DE-RP04-98AI78650 to the National Park Service/ Bandelier National Monument. A piece of land in the TA-49 area for a construction of a fire cache to be readily accessible during forest fire activities.

Contract DE-GM32-00AL77169 to the National park Service. Land to be used as a Wild Life Reserve Center. DOE provide sufficient annual payments .

Contract # DE-A132-77DPO3792 to the U.S.D. Forest Service to provide liaison support to the Los Alamos National Laboratory and the Los Alamos Site Office. This contract is really a lease of a building on County land. The Department pays half of the lease and half of the salaries of the Forest Service. Annual contract amount is 40K.

Contract DE-RP04-01AL67224 to the National Science Foundation. Approximately 2.43 acres and utilities for a national Science Foundation building which support the Very Large Baseline array project.

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

No because these contract are provided to other entities and in turn they provide the NNSA with a service.

Is part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)

On contract DE-A132-77DPO3792 between the Forest Service and the NNSA the Forest Service pays 50%.

What is the estimated amount that is not reimbursed?

Don't know ??

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

Yes we receive services.

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.

No our agreements stipulate that when the agreement is over the lands revert back to NNSA control.

Does your entity anticipate continuing to provide the use of the real property in future years?

Yes

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

Can't determine don't know

II. Receiver Questions:

This part is not applicable to the Los Alamos Site Office

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information:

Which federal agency (or agencies) provides the use of the real property?

Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? See SFFAS No. 4, par. 112.)

Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered.

OPM's Response:

"Not Applicable"

Maurice O. Duckett
OPM

AGENCY RESPONSE: Dept. of Health & Human Services (HHS)
CONTACT NAME: Sue Mundstuk

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

HHS Answer: HHS Operating Divisions do not provide the use of real property to other federal Entities without reimbursement or with less than full reimbursement.

Which federal agency (or agencies) receives the use of real property?

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)

What is the estimated amount that is not reimbursed?

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.

Does your entity anticipate continuing to provide the use of the real property in future years?

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information:

HHS Answer: *The Food & Drug Administration and the Indian Health Service receive the use of real property from other federal agencies as shown below.*

Which federal agency (or agencies) provides the use of the real property?

<u>For F&D</u>	U.S. Attorney's Office 138 Delaware Avenue Rooms 563 & 564 Buffalo, NY	USF 380	\$7,700 Est. Value
	U.S. Attorney's Office 615 Chestnut Street Suite 1250 Philadelphia, PA	USF 170	\$4,200
	DEA 3010 N. 2 nd Street Phoenix, AZ	USF 109	\$2,400
	FBI 1110 3 rd Avenue Seattle, WA	USF 64	\$3,300
	US Customs 9901 Pacific Highway Blaine, WA	USF 81	\$4,800
	US Customs 2203 North Lois Avenue Suite 600 Tampa, FL	USF 36	\$ 900

For IHS U.F. Air Force

Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

For FDA *Receives the use of the property without reimbursement.*

For IHS *Reimburses the AF for utility and custodial services only. This is a warehouse provided to us under Operation Transam whereby DoD provides IHS access equipment and supplies.*

What is the reimbursed amount for each real property cost and can you estimate the amount of cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

For FDA *See above for estimated costs.*

For IHS *Reimburses the AF \$16,000 for the services. The rental cost is unknown. Perhaps the AF can provide.*

Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

HHS *No.*

Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? See SFFAS No. 4, par. 112.)

For FDA *No, the costs are insignificant compared to the total rent bill.*

For IHS *No, any rental costs at this one facility would not be significant to the overall IHS appropriation of \$2.4 billion.*

Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

For FDA *Yes, these are critical OCI domiciles.*

For IHS *Yes.*

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

For HHS *Yes, the non-reimbursed costs are not a significant cost to this entity.*

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered.

AGENCY RESPONSE: Dept. of Agriculture (USDA)
CONTACT NAME: Robert Darragh (202-720-0994)

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? **No.**

If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

Which federal agency (or agencies) receives the use of real property?

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)

What is the estimated amount that is not reimbursed?

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please explain why not.

Does your entity anticipate continuing to provide the use of the real property in future years?

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? **Yes** If it does, please provide a

description of the real property that your entity uses and for each real property use please supply the following information:

Which federal agency (or agencies) provides the use of the real property?

GSA provides use of the USDA Headquarters Complex (South Building, Cotton Annex Building, and Whitten Building).

Does your entity (a) reimburse a part of the real property costs, or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

In lieu of rental payments, USDA is paying for the modernization of the buildings.

What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

The annual cost of modernization is estimated to be \$X for the next X years. The difference between the annual cost of modernization in lieu of rental payments is not known. This information may be available from GSA.

Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

Since the difference between the annual cost of modernization in lieu of rental payments is not known, non-reimbursed real property costs can not be determined.

Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? See SFFAS No. 4, par. 112.)

Yes.

Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

Yes.

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

No, since the cost of modernization is in lieu of rental payments.

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered.

AGENCY RESPONSE: Dept. of Justice (DoJ)
CONTACT NAME: Chris Alvarez (202-616-5234)
Gail Jenkins (202-616-5228)

Providing Entity Survey – Department of Justice

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

Description: Both the Drug Enforcement Administration (DEA) and the Federal Bureau of Investigation (FBI) routinely provide space in their field offices for various Task Forces, as well as for staff from other state, local and federal law enforcement agencies and foreign consulates. The general "rule of thumb" for task forces is whichever agency has the lead, pays for the space. The amount of space devoted to detailed personnel varies tremendously by task force size, length of time, and overall size of the field office.

Another example is the US Attorney Offices (USAO) nationwide. The purpose of the USAO is to act as the chief law enforcement officer in each judicial jurisdiction. They also are responsible for coordinating multiple agency investigations within each district. Thus, the USAOs frequently provide office and trial support space to a wide range of other federal agencies and Department of Justice (DOJ) Components. Any federal agency trying a case within the jurisdiction of a USAO typically will ask the USAO if any space is available. Because the USAO also has an interest in the case if not direct oversight, the USAO does not request reimbursement from participating agencies. Lastly, the occupation of USAO space is in direct support of DOJ mission activities and the temporary occupation by various other federal agencies is incidental.

Survey Questions:

1. Which federal agency or agencies receives the use of real property?

Users of DOJ field office space include all federal law enforcement agencies, various DOJ headquarters offices, other Government agencies such as EPA, and state and local agencies.

2. Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

The full cost of the use of the real property, in this case miscellaneous office space within existing offices, is unable to be measured, due to the varying sizes of task force and trial teams, the varying lengths of time for which such task forces and trials require space, the hundreds of offices nationwide within which these instances occur, and most importantly the dynamically changing mix of incidental partner occupants.

Provider Entity Survey – Department of Justice (continued)

3. Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed).

NO.

4. What is the estimated amount that is not reimbursed?

100%.

5. Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

YES. The providing entity gains the assistance of the other agency that has detailed personnel to the task force or trial team.

6. If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment or allocation basis? If your entity would not be able to assign the costs, please explain why not.

No. Costs would not be assignable due to the varying sizes of task force and trial teams, the varying lengths of time for which such task forces and trials require space, the hundreds of offices nationwide within which these instances occur and most importantly the dynamically changing mix of incidental partner occupants.

7. Does your entity anticipate continuing to provide the use of real property in future years?

YES.

8. Do you believe these real property costs meet the inter-entity cost recognition criteria? Please provide reasons for your reply.

NO. The costs don't meet the test of materiality because they are a relatively minor part of the many overall DOJ missions and programs. Secondly, the nature of the support is broad and general; the office space is used by a broad spectrum of government entities, both federal and state/local. Thirdly, the costs of the space provided to detailed personnel/task forces are not significant to the provider entity, because the actual percentage of space used varies so significantly among locations. Lastly, the costs associated with office space for detailed personnel/task forces would be extremely difficult to quantify, and could not be matched to the receiving entity with reasonable precision.

Receiving Entity Survey – Department of Justice

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property that your entity uses and for each real property use, please supply the following information:

Description: DOJ occupies offices overseas, which are essential for the conduct of various DOJ programs and missions. As a matter of general Government practice, overseas office space is located primarily in buildings or facilities controlled by the Department of State.

Survey Questions:

1. Which federal agency (or agencies) provides the use of the real property?

The State Department provides the Department of Justice (DOJ) with office space overseas.

2. Does your entity (a) reimburse a part of the real property costs or (b) receive the use of the real property without any reimbursement? (Please note the questionnaire excludes inter-entity costs that are fully reimbursed.)

DOJ currently does not reimburse the State Department for rent costs for space overseas. However, in October 2002, the State Department proposed an overseas capital security cost sharing program, which was developed to have all federal agencies with an overseas presence pay a portion of the State Department's new building program. The State Department is currently building or planning to build dozens of overseas facilities to provide secure, safe and functional workspaces for government employees overseas. DOJ, along with other federal agencies, currently does not pay for any of the capital costs of constructing these new facilities. Effective in FY 2005, the State Department will assess a capital surcharge based on overseas staffing levels to all federal agencies with an overseas presence.

3. What is the reimbursed amount for each real property cost and can you estimate the amount of the cost that is not reimbursed? If so, what is the amount? If not, would this information be available from the providing entity?

Although DOJ does not currently reimburse the State Department for rent costs overseas, DOJ will be assessed a capital surcharge in FY 2005 to contribute to the construction costs of secure new facilities overseas. It is estimated that the FY 2005 capital surcharge for DOJ will be \$63 million. Because State Department is implementing the capital surcharge program in stages, the FY 2005 surcharge only represents a portion of the DOJ's annual costs. The FY 2006 capital surcharge is more representative of DOJ's annual share of costs, which is estimated at \$77 million.

Receiving Entity Survey – Department of Justice (continued)

4. Does your entity give the providing entity any non-monetary compensation (such as a reciprocal service) for the non-reimbursed real property costs? If so, please explain the type of compensation.

No.

5. Are the estimated real property costs significant to your entity? (Or, are the real property costs large enough that management should be aware of cost when making decisions? (See SFFAS No. 4, par 112.)

Yes, the estimated costs of \$63 million in FY 2005 and \$77 million in FY 2006, representing DOJ's contribution to the overseas capital security cost sharing program, is significant. The costs are significant enough that the Office of Management and Budget has postponed implementation of the overseas capital security cost-sharing program until FY 2005 to allow DOJ and other federal agencies to include the funding in the FY 2005 budget.

6. Is the use of the real property an integral or necessary part of your entity's output? (See SFFAS No. 4, par. 112.)

Yes, DOJ requires an overseas presence in order to fully implement its law enforcement mission.

7. Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4.) Please provide reasons for your reply.

Yes, the real property costs for space overseas meet the inter-entity cost recognition criteria. The estimated annual cost of \$77 million in FY 2006 for DOJ's share of the overseas capital security cost-sharing program is large enough that management should be aware of these costs when making decisions, which could affect the number of DOJ positions overseas. Furthermore, the presence of DOJ positions overseas is a necessary part of operations and plays an integral part in the Department's law enforcement mission.

AGENCY RESPONSE: Environmental Protection Agency (EPA)
CONTACT NAME: Pamela Doucoure (202-564-4939)
Juliette McNeil

We reviewed the specific questions presented on the survey, but none appear applicable to EPA. Our internal survey disclosed that EPA does not have real property leased to other agencies nor does it use other agencies' real property without reimbursement. Therefore, we do not have any information to report.

AGENCY RESPONSE: General Services Administration (GSA)
CONTACT NAME: Edward Gramp (202-501-0593)
Larry J. Bedker

I. Provider Questions:

Does your entity provide the use of real property to other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property use your entity provides and for each real property use please supply the following information:

These questions are relevant to a small portion of our total inventory of rentable space; however, yes, most provide partial reimbursement. GSA's rate is not solely based on full cost; it includes items such as an additional percentage to fund capital improvement programs.

Which federal agency (or agencies) receives the use of real property?

See attachments.

Is your entity able to measure the full cost of the use of the real property in accordance with the full cost standard in SFFAS No. 4? If yes, please provide the full costs of those uses. If not, please explain why not?

GSA calculates full cost per building instead of per customer. In some cases where the agency occupies the entire site, it is possible. However, our rate is not only based on full cost, it also builds in other factors such as funding for capital improvement programs. We do identify the lost or foregone rents, as shown in the attachments provided.

Is a part of the costs reimbursed by the receiving entities? If so, what percentage of the full cost is reimbursed? (Please note, the questionnaire excludes inter-entity costs that are fully reimbursed.)

GSA normally receives partial reimbursement. See attachments for details.

There are some cases where customers reimburse us for only the full cost of the space for that period. This however is still less than our assigned rate for such space.

What is the estimated amount that is not reimbursed?

See attachments for the annual foregone rents per customer.

Does your entity receive any non-monetary compensation (such as a reciprocal service) from any of the receiving entities for the use of the real property that is not reimbursed? If so, please explain the type of compensation.

Yes, in a limited number of cases. See attachments for details.

If more than one entity receives the use of the real property, would your entity be able to assign the non-reimbursed real property costs among the receiving entities? If so, what would be the assignment (or allocation) basis? If your entity would not be able to assign the costs, please

explain why not.

Even though most of our buildings are multi-tenant, GSA does not make a practice of reassigning un-reimbursed costs to other customers; however, yes, we could.

Does your entity anticipate continuing to provide the use of the real property in future years?

Yes.

Do you believe these real property costs meet the inter-entity cost recognition criteria? (See paragraphs 111 through 113, SFFAS No. 4) Please provide reasons for your reply.

Yes, we believe some cost recognition is appropriate. However, it is unclear whether the foregone rent should be used as a basis of the customers recognizing cost due to the other factors that are included in our rate calculation. In some cases due to specific legislation or congressional exemption, agencies reimburse us up the full cost of their space; therefore, would not incur additional imputed costs on their books. See attachments for details per customer.

II. Receiver Questions:

Does your entity receive the use of real property from other federal entities without reimbursement or with less than full reimbursement? If it does, please provide a description of the real property that your entity uses and for each real property use please supply the following information: *NO*

III. General Question:

Please detail any other factors specific to inter-entity real property costs that should be considered. *N/A*

General Services Administration
Public Buildings Service
GSA-controlled Locations with Subsidized Rents to Customer Agencies

Address	State	RSF	Estimated Foregone Rent	Tenant
1 Bowling Green	NY	131,207	\$4,380,000	Smithsonian (1)
271 Cadman Plaza	NY	60,000	\$1,820,000	Post Office Agreement (2)
5th & F Sts.	DC	74,018	\$1,300,000	National Building Museum (3)
1300 Penns. Ave.	DC	104,101	\$5,400,000	Woodrow Wilson Center (4)
700 Grant St.	PA	49,326	\$368,697	USPS (5)
14th & Constitution Ave.	DC	16,000	\$400,000	Commerce (6)
M St., SE	DC	574,576	\$7,038,567	NIMA (7)
Nationwide locations		138,284	\$261,090	Senate (8)
12th & Jefferson Dr.	DC	324,903	*	Agriculture (9)
12th & C Sts.	DC	72,522	*	
14th & Independence Ave.	DC	1,806,711	\$43,000,000	
Nationwide locations		414,476	\$3,600,000	Railroad Retirement Bd. (10)
		1,326,142	\$17,000,000	Centers for Medicare & Medicaid Svcs.(11)
		26,431,812	\$40,000,000	Social Security Administration (12)

Total	31,524,078	\$124,568,354
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* Included in the \$43M shown for Bldg. at 14th & Independence

FOOTNOTES:

(1) The legislation directing GSA to provide 1st and 2nd floor space for the Musuem of the American Indian also stipulates that GSA will only charge them \$1.00 for the space.

(2) The USPS has a 99 year rent free deal with GSA that was part of the negotiated sale (or transfer?) of the building from USPS to GSA.

(3) A cooperative agreement provides for the museum organization to occupy the museum rent free in accordance with P.L.96-515.

(4) The WWC was granted a rent exemption in 1997.

(5) The agreement that transferred this building from the USPS to GSA included rent-free occupancy for 20 years (due to expire in May 2004) for the Postal Service.

(6) Rent is reduced because the National Aquarium Society (NAS) occupies some space through an MOU originally signed between the Fish and Wildlife Service (DOI), GSA, and NAS in 1982. The agreement gave a revocable license to NAS so that they could in turn hire a contractor to run the facility.

(7) Because of security concerns by the tenant, GSA does not have access to this building. By agreement, the tenant is responsible for funding all capital improvements for the building, as required, in addition to providing all operating and security services in return for GSA charging only ½ rent.

(8) The Senate's interpretation of the MOU agreement with GSA is that they do not have to pay Tenant Improvement charges. GSA disagrees with that interpretation but has been unable to collect.

(9) This is the result of OMB passback direction for the FY 1996 Budget. An agreement between USDA, OMB, and GSA was made for GSA to not bill USDA for their three headquarters buildings for a period of time such that USDA could accumulate funds needed for major repairs on these buildings. According to GSA records, we believe we should again start billing USDA for these buildings in fiscal year 2004.

(10) RRB requested and has been granted a partial rent exemption allowing them to pay only actual cost for their space in Fiscal Year 2002.

(11) CMS requested and has been granted a partial rent exemption allowing them to pay only actual cost for their space in Fiscal Year 2002.

(12) SSA requested and has been granted a partial rent exemption allowing them to pay only actual cost for their space in Fiscal Year 2002.

AGENCY RESPONSE: Department of Commerce (DoC)

**CONTACT NAME: Gordon T. Alston
Tony Akande (202-482-0239)**

The Department of Commerce is hereby providing our response to the Accounting and Auditing Policy Committee's questionnaire on Inter-Entity Real Property Costs. Please note that the "Provider" questions in your survey are not applicable to the Department. The "Receiver" questions apply to only one of our bureaus, and our answers to those questions are hereby attached.

Thank you for providing us with the opportunity to participate in your research. We hope that our response will provide you with a better understanding of the Inter-Entity Real Property Costs at our Department. If you have any questions regarding our response, please contact Tony Akande of my staff at 202-482-0239.

DOC Entity	Property Description	1. Federal Agency Provider	2. Do you reimburse part of the cost of property received?	3. Amount of Reimbursement or Estimate of Unreimbursed cost	Do you give the provider any Non Monetary Compensation?	5. Are the estimated real property costs significant to your entity?	6. Is the use of the real property an integral part of your operation?	7. Do these costs meet the recognition criteria?	General Comments
• Oceanic and Atmospheric Research (OAR), • Air Resource Laboratory (ARL), • Atmospheric Science Modeling Division (ASMD)	office space	Environmental Protection Agency	No	Can't estimate. Use of office space is received under an interagency agreement	Provide air quality modeling research and consultation under an interagency agreement.	No	Yes	Difficulty interpreting SSFA No. 4	
Western Administrative Support Center (WASC)	land for installation of weather related instruments	94 agreements with a variety of agencies: Department of Defense, Federal Aviation Administration, Bureau of Land Management, and Forest Services	No	We reimburse a proportionate share of cost of services and utilities. Estimate of unreimbursed cost is not available.	No	No	Yes	No	
Aircraft Operations Center (Aoc)	storage and building facilities	Air Force, Air Mobility Command, 6th Air Mobility Wing	Aircraft Operation Center (AOC) responsible for maintenance and a portion of overhead associated with building.	None/ Estimated unreimbursed cost is \$1.25 million per year.	Aircraft Operation Center (AOC) and 6th Mobility wing work together in providing a variety of non-monetary compensation.	Yes	Yes	Yes	
• Oceanic and Atmospheric Research (OAR), • Air Resource Laboratory (ARL), • Atmospheric Turbulence and Diffusion Division (ATDD)	office space	Department of Energy	Yes	We pay \$120,000/year for utilities and general maintenance.	We provide access to our meteorological data and a ready resource for the Department of Energy in case of an accidental release.	Yes	Yes	Yes	DOE plans to transfer the property to NOAA by the end of 2003.

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National Marine and Fisheries Services	research station in San Miguel Calif.	U.S. Navy	No	\$0	No	No	Yes	NA	
National Marine and Fisheries Services	research station in San Miguel Calif.	Army Corps of Engineers, Fish and Wildlife Services	No	can't estimate cost	No	N/A	Yes	N/A	
National Marine and Fisheries Services	office space in Calif.	Fish and Wildlife	No	\$0	No	No	No	No	
• Oceanic and Atmospheric Research (OAR), • Environmental Technology Laboratory (ETL)	land	U.S. Navy, Coast Guard and Bureau of Land Management	No	Estimated unreimbursed cost of \$2,400/year	No	No	Yes	Yes	
National Weather Service	building	Federal Aviation Administration	No	Estimated unreimbursed cost of \$474,000/year	No	No		No	
National Weather Service	storage	Geological Survey and Army Corps of Engineers	No	Estimated unreimbursed cost of \$180,000/year	No	No	Yes	No	

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National Weather Service	storage	Army Corps of Engineers	No	Estimated unreimbursed cost of \$9,600/year	No	No	Yes	No	
National Weather Service	storage	Army Corps of Engineer	No	Estimated unreimbursed cost of \$6,000/year	No	No	Yes	No	
National Weather Service	storage	Forest Service, Department of Agriculture	No	Estimated unreimbursed cost of \$9,600/year	No	No	Yes	No	
National Weather Service	radar location	Department of Army	No	Estimated unreimbursed cost of \$9,600/year	No	No	Yes	No	
National Weather Service	storage	U.S. Park Service	No	Estimated unreimbursed cost of \$1,200/year	No	No	Yes	No	
National Weather Service	storage	U.S. Coast Guard	No	Estimated unreimbursed cost of \$9,000/year	No	No	Yes	No	

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National Weather Service	storage	Army Corp. of Engineers, Bureau of Reclamation, Geological Survey	No	Estimated unreimbursed cost of \$95,700/year	No	No	Yes	No	
National Weather Service	land	Tennessee Valley Authority, Marine, Department of Agriculture	No	\$0	No	No	Yes	No	